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6 *Attorneys for Defendants Ramparts, LLC*  
 7 *dba Luxor Hotel & Casino, New Castle Corp.*  
*dba Excalibur Hotel & Casino, Circus Circus Casino Inc.*  
*dba Circus Circus Hotel & Casino*

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 TRUSTEES OF THE NEVADA RESORT  
 ASSOCIATION—INTERNATIONAL  
 12 ALLIANCE OF THEATRICAL STAGE  
 EMPLOYEES AND MOVING PICTURE  
 13 MACHINE OPERATORS OF THE UNITED  
 STATES AND CANADA, LOCAL 720,  
 PENSION TRUST; TRUSTEES OF THE  
 14 NEVADA RESORT 'ASSOCIATION  
 INTERNATIONAL ALLIANCE OF  
 THEATRICAL STAGE EMPLOYEES AND  
 16 MOVING PICTURE MACHINE OPERATORS  
 OF THE UNITED STATES AND CANADA,  
 LOCAL 720, WAGE DISABILITY TRUST;  
 and TRUSTEES OF THE NEVADA RESORT  
 18 ASSOCIATION—INTERNATIONAL  
 ALLIANCE OF THEATRICAL STAGE  
 EMPLOYEES AND MOVING PICTURE  
 19 MACHINE OPERATORS OF THE UNITED  
 STATES AND CANADA, LOCAL 720,  
 APPRENTICE AND JOURNEYMAN  
 21 TRAINING AND EDUCATION TRUST,

22 Plaintiffs,

23 vs.

24 RAMPARTS, LLC dba Luxor Hotel & Casino, a  
 Nevada limited liability company; NEW  
 25 CASTLE CORP. dba Excalibur Hotel & Casino,  
 a Nevada corporation; and CIRCUS CIRCUS  
 26 CASINOS INC. d/b/a CIRCUS CIRCUS  
 HOTEL & CASINO, a Nevada corporation,

27 Defendants.

Case No.: 2:19-cv-01536-CDS-BNW

**SECOND JOINT STATUS REPORT  
REGARDING STATUS OF  
SETTLEMENT AND REQUEST TO  
CONTINUE NOVEMBER 10, 2022  
STATUS HEARING**

1 Plaintiffs, Trustees of The Nevada Resort Association—International Alliance of  
 2 Theatrical Stage Employees and Moving Picture Machine Operators of The United States And  
 3 Canada, Local 720, Pension Trust; Trustees of The Nevada Resort Association—International  
 4 Alliance of Theatrical Stage Employees and Moving Picture Machine Operators of The United  
 5 States and Canada, Local 720, Wage Disability Trust; and Trustees of The Nevada Resort  
 6 Association—International Alliance of Theatrical Stage Employees and Moving Picture Machine  
 7 Operators of The United States and Canada, Local 720, Apprentice and Journeyman Training  
 8 and Education Trust (“Plaintiffs”), through their counsel The Urban Law Firm, and Defendants  
 9 Ramparts, LLC dba Luxor Hotel & Casino, New Castle Corp. dba Excalibur Hotel & Casino,<sup>1</sup>  
 10 Circus Circus Casinos Inc. dba Circus Circus Hotel & Resort,<sup>2</sup> (“Defendants”) through their  
 11 counsel Jackson Lewis P.C., hereby submit the following second status report regarding  
 12 settlement:

13 1. The Parties reached a settlement in principle at the conclusion of their July 22,  
 14 2022 mediation with The Honorable Peggy Leen. The settlement was subject to ratification by  
 15 the Plaintiffs’ full Board of Trustees, which met in September of 2022.

16 2. The Board of Trustees approved the settlement reached at mediation on or about  
 17 September 13, 2022.

18 3. The parties have exchanged drafts of the proposed final settlement agreement.  
 19 Specifically, Defendants sent a draft agreement on August 19, 2022, and Plaintiffs responded  
 20 with a revised draft agreement on August 31, 2022.

21 4. The parties finalized a formal settlement agreement. Plaintiffs signed the  
 22 agreement on October 20, 2022. Defendants signed the agreement on November 7, 2022.

23 5. Pursuant to the terms of the final agreement, Defendants have thirty (30) days  
 24 from the date they signed the settlement agreement to submit a one-time lump sum payment to  
 25 Plaintiffs.

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26  
 27 <sup>1</sup> Defendant New Castle, LLC, is incorrectly named “New Castle Corp.” in the Complaint.  
 28 <sup>2</sup> The Complaint incorrectly identifies Circus Circus Casinos, Inc. dba Circus Circus Hotel & Resort as  
 “dba Circus Circus Hotel & Casino.”

1       6. Also pursuant to the terms of the final agreement, Plaintiffs will not be required to  
2 submit a stipulation and order for dismissal until Plaintiffs receive the payment.

3       7. A status conference is currently set for November 10, 2022, at 10:00am.  
4 However, it is unlikely that Defendants will be able to submit the lump sum payment by that  
5 date, or that Plaintiffs would then have sufficient time to file the stipulation and order for  
6 dismissal.

7       Thus, the parties request this Court reschedule a settlement status check conference in  
8 approximately thirty (30) days, at the Court's convenience, to permit the parties time for the final  
9 completion of the settlement process and to file a stipulation and order for dismissal.

10      Given the prospective settlement of this matter, the parties also request that all other  
11 deadlines, including all discovery deadline currently pending, remain stayed pending submission  
12 of the stipulation and order to dismiss this action.

13      Dated this 8th day of November, 2022.

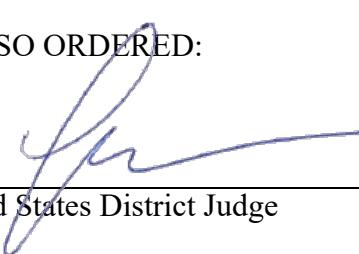
14      **THE URBAN LAW FIRM**

15      **JACKSON LEWIS P.C.**

16      \_\_\_\_\_  
17      /s/ *Michael A. Urban*  
18      Michael A. Urban, NV SBN 3875  
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24      /s/ *Paul T. Trimmer*  
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28      Las Vegas, Nevada 89101  
29      Attorneys for Defendants

30      **ORDER**

31      IT IS SO ORDERED:  
32        
33      \_\_\_\_\_  
34      United States District Judge

35      Dated: November 9, 2022